

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIEL BARNES and

AMBER L. MARQUARDT,

Defendant(s).

) SUPERSEDING CRIMINAL INDICTMENT
)
) 2:13-cr-00423-JCM-GWF
)
) **VIOLATIONS:** Title 18 U.S.C. § 2423(a) –
) *Transportation of a Minor for Prostitution;*
) Title 18 U.S.C. § 1591(a)(1) – *Trafficking of a*
) *Child; and Title 18 U.S.C. § 2251(a) – Sexual*
) *Exploitation of Children; Title 18 U.S.C. § 2*
) *– Aiding and Abetting*

Count One

defendants herein, did knowingly transport an individual, that is "J.M.," a minor, who at the time was under the age of 18 years, in interstate commerce from in or about Las Vegas, Nevada to California with the intent that J.M. engage in prostitution and sexual activity for which any person can be charged with a criminal offense, in violation of Title 18 United States Code, Sections 2423(a) and 2.

Count Two
TRAFFICKING OF A CHILD

Between on or about April 2013 and May 2013, in the State and Federal District of Nevada and elsewhere,

**DANIEL JAMES BARNES and
AMBER LYNN MARQUARDT,**

defendants herein, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means, "J.M.," a minor, knowing that said person would be caused to engage in commercial sex acts, in violation of Title 18 United States Code, Section 1591(a)(1) and 2.

Count Three
SEXUAL EXPLOITATION OF CHILDREN

Between on or about April 2013 and May 2013, in the State and Federal District of Nevada,

DANIEL JAMES BARNES,

defendant herein, did employ, use, persuade, induce, entice and coerce a minor, "J.M.," to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce, and the visual depiction was produced or transmitted using

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1 materials that have been mailed, shipped or transported in or affecting interstate commerce by
2 any means, including a computer, in violation of Title 18, United States Code, Sections 2251(a)
3 and 2.

4 **DATED:** this 15th day of October, 2014.

5
6 **A TRUE BILL:**

7 /S/
8 FOREPERSON OF THE GRAND JURY

9 DANIEL G. BOGDEN
10 United States Attorney

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12 SEAN C. JONES
13 Special Assistant United States Attorney
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